

To: Anderson, Carol[Anderson.Carol@epa.gov]
From: Russ, Timothy
Sent: Wed 11/2/2016 2:18:36 PM
Subject: FW: I-70 East: Info for Phil

Hi Carol,

As you know, I did send an additional email to Jeff Houk (FHWA), on 10/27/16, with three questions and requesting additional information as below:

“Hi Jeff,

Thanks for forwarding the below email from Region 9. We had a couple of other questions regarding the information that FHWA presented at Tuesday’s (10/25/16) Cooperating Agencies meeting and would appreciate additional information that we will want to share within Region 8 and OTAQ.

1.) The attached email from Region 9, regarding the PM₁₀ conformity consultation for the South Mountain Freeway project near Phoenix, AZ, addressed comments and FHWA responses on the Draft EIS for the project. Did Region 9 provide additional comments and/or conformity consultation on the Final EIS?

Ex. 5 - Deliberative Process

3.) We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher percentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and

using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

"To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on 1-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?"

We responded to this question in our letter of 6/22/16, which CDOT and FHWA received a copy, and noted:

"B.) Question #3 regarding truck emissions:

The EPA's transportation conformity regulation requires that estimated pollutant concentrations must be based on the total emission burden which may result from the project and future background concentrations (40 CFR 93.123©(I)). The EPA's guidance for modeling emissions from highways is that local traffic data should be used to characterize each link sufficiently. As we noted above, an updated hot-spot analysis is being developed for 2040 by CDOT/FHWA, and the EPA will be reviewing the percentage of trucks used for the analysis."

Ex. 5 - Deliberative Process

We have not received that information yet. Once we do, and have a chance to review it, we'll schedule a call with OTAQ to further discuss our concerns.

I did advise Scott of the 10/25/16 meeting outcome and we can certainly have a meeting with Phil if he would like.

Thanks!

Tim

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From: Anderson, Carol
Sent: Tuesday, November 01, 2016 4:43 PM
To: Russ, Timothy <Russ.Tim@epa.gov>
Subject: I-70 East

Tim,

I am meeting with Phil tomorrow (Wed). He was out last week so I could not debrief him about the Cooperating Agency meeting last Tuesday. However, I know that he received your email about the meeting. I just wanted to share my thoughts with him. Did you get a chance to meet with Scott? I think that Phil will want all of us to get together about this. Do you have any additional thoughts that I can share with Phil when I meet with him at 1 p.m. tomorrow?

Carol

Carol M. Anderson

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